


- UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

12. I attended an orientation session at WORCESTER PISTOL AND RIFLE CLUB, INC.
13. On or about April 2, 2020, I learned that I had been accepted for membership in  
WORCESTER PISTOL AND RIFLE CLUB, INC.
14. I paid my 2020 dues for membership in WORCESTER PISTOL AND RIFLE CLUB,  
INC.
15. I received a key “fob”, allowing me access to the property of WORCESTER PISTOL  
AND RIFLE CLUB, INC. as a full member.
16. At the time I was accepted for membership in WORCESTER PISTOL AND RIFLE  
CLUB, INC, the club was closed due to the COVID-19 outbreak.
17. During that time, I did not feel comfortable using my weapon without adequate training  
or practice, and I refrained from doing so.
18. The club reopened after Massachusetts entered Phase I of its reopening plan, and it has  
remained open since then.
19. After the club reopened, I have used it on a regular basis to train with my gun.
20. After gun and ammunition retailers reopened, I purchased a second gun (a shotgun), as  
well as ammunition, targets and a cleaning kit. I have needed regular access to a gun store  
in order to practice with my guns.
21. I am concerned about the possibility that Massachusetts will need to return to  
“lockdown” conditions if COVID-19 surges during the coming months and that, if so,  
gun and ammunition retailers and shooting ranges will again be ordered to close.
22. If Massachusetts returns to a lockdown, it appears that the only thing that would prevent  
the Commonwealth from again ordering the closure of gun ranges and training facilities  
is an order from this Court.

23. I feel that, without access to a range and training facilities on a regular basis, I will be unable to keep myself properly acquainted with my gun and properly train to defend myself.

I affirm all of the foregoing statements under penalty of perjury under the laws of the United States of America.

Dated: September 23, 2020

  
Thomas Leighton